To Whom It May Concern:

The Montana Department of Environmental Quality (DEQ) has prepared the following environmental assessment as required by law in ARM 17.4.607(2) and ARM 17.4.609(2). This project involves installing a double-walled fiberglass waste oil underground storage tank and secondarily contained flexible piping at the Child and Family Intervention Center, 3212 1st Avenue South, Billings, Montana. The legal description of the property is Lots 1-24 Block 2 in the Yegen Subdivision, Section 3, Township 1 South, Range 26 East, M.P.M.

The DEQ prepares environmental assessments to inform interested government agencies, public groups, or individuals of a proposed action and to determine whether or not the action may have a significant effect on the human or natural environment. This environmental assessment will be circulated for seven days. After the seven-day comment period, DEQ will decide what action to take regarding this permit.

If you care to comment on this proposed project or the attached environmental assessment, please write or email the Permitting & Compliance Division. Comments must be in writing and must be received by **January 3, 2006**. Our email address is ustprogram@mt.gov and our mailing address is P.O. Box 200901, Helena, MT, 59620-0901.

Sincerely,

Brett G. Smith

Digitally signed by Brett G. Smith
DN: CN = Brett G. Smith, C = US, O = Department of Environmental Quality
Date: 2005.12.28 13:21:52 -07'00'

Brett G. Smith
Environmental Engineer Specialist
Construction Program, UST Section
Waste and Underground Tank Management Bureau

enc. Environmental Assessment

O/O NAME: School District No 2, CFIC Realty, LLC	FACILITY NO: 60-15027
PERMIT NO: 06-0097	DATE OF APPLICATION: 12/23/2005
PERSON PREPARING EA: Brett G. Smith, Environmental Engineer Specialist	COUNTY: Yellowstone
LOCATION: 3212 1st Avenue South, Billings, Montana. Lots 1-24 Block 2 in the Yegen Subdivision, Section 3, Township 1 South, Range 26 East, M.P.M	
FACILITY NAME: Child and Family Intervention Center	EA COMPLETED: 12/28/05
DESCRIPTION OF PROPOSED ACTION: Installing a 6,000-gallon fiberglass double-walled waste oil underground storage tank with secondarily-contained OPW flexible piping. The UST will be installed at a new facility. The piping systems will be a combination of safe suction and U.S. suction. The tank will have a tank-top sump with an interstitial sensor installed in the sump. The tank will also have an interstitial sensor in the interstice.	
DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION: Purpose is to install an alternative fuel source for heating the facility. The benefits include safe fuel storage for use as heat generation in Billings, Montana.	

A: Significant unavoidable impacts
B: Potential significant impacts mitigated based upon license conditions
C: Insignificant as proposed

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
PHYSICAL ENVIRONMENT						
1. TOPOGRAPHY: Are there unusual geologic features? Will the surface features be changed?			X			No impact. Location is currently a school in a residential area with no unusual surface features.
2. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE: Are fragile, compactible or unstable soils present? Are there special reclamation considerations?			X			Based on a review of neighboring well logs, the predominant soils that are present are coarse gravels, sands, clays and silts. There are no special reclamation considerations for this site.
3. WATER QUALITY, QUANTITY AND DISTRIBUTION: Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?		X				Important water resources are present. There are several domestic and irrigation groundwater wells within one-quarter mile of this project. Average depth of the wells is 22' below ground surface (BGS) with an average static water level of 11.5'BGS. Potential violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality is mitigated by installation of a double-walled tank and piping and electronic tank and piping leak detection.

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
						Improper operation of this system would increase the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Leak detection systems serve to mitigate the potential impacts immediately reducing the amount of fuel available to be released into the environment.
4. AIR QUALITY: Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?			X			Petroleum vapors will be released at this site. Natural air currents and vent pipes will dissipate hydrocarbon vapors to a safe level. The closest Class I Area is the Absarokee Beartooth Wilderness area.
5. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY: Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?			X			There are no known resources that are limited in the area. It is unknown if there are other activities nearby that will affect the project.
6. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: Are there other studies, plans or projects on this tract?			X			There are no known studies, plans or projects that would impact environmental resources on this tract.
7. TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS: Is there substantial use of the area by important wildlife, birds or fish?		X				There is no substantial use of this area by wildlife, birds, or fish. Potential harm to wildlife, birds and fish is mitigated by installation of a double-walled tank and piping and electronic tank and piping leak detection.
8. VEGETATION COVER, QUANTITY AND QUALITY: Will vegetative communities be permanently altered? Are any rare plants or cover types present?			X			No impact. Project area is currently a school area. No rare plants or cover types have been reported to the reviewer.

					POTENTIAL IMPACTS	
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Any species of special concern?			X			No federally listed threatened or endangered species, identified habitat, or species of special concern has been reported to the reviewer. Designated wetlands were not noted in this area.
10. HISTORICAL AND ARCHEOLOGICAL SITE: Are any historical, archeological or paleontological resources present?			X			No data relating any historical, archeological or paleontological resources was reported to the reviewer.
11. AESTHETICS: Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?			X			No impact. Area is currently a developed residential area with an existing school onsite. Noise, light, and odors will be minimal.
12. AGRICULTURE: Will grazing lands, irrigation waters or crop production be affected?			X			Agricultural lands are not adjacent to the project and no impact is anticipated.
HUMAN ENVIRONMENT						
1. SOCIAL STRUCTURES AND MORES: Is some disruption of native or traditional lifestyles or communities possible?			X			It is not anticipated that the project will disrupt native or traditional lifestyles or communities.
2. CULTURAL UNIQUENESS AND DIVERSITY: Will the action cause a shift in some unique quality of the area?			X			It is not anticipated that the project will cause a shift in any unique quality of the area.
3. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING: Will the project add to the population and require additional housing?			X			It is not anticipated that the installation of the underground storage tank system will project will add to the population or require additional housing.
4. HUMAN HEALTH & SAFETY: Will this project add to health and safety risks in the area?		X				It is anticipated that natural air currents and tank vents will dissipate the hydrocarbon vapors to a safe level. Leak detection equipment is designed to detect releases before serious health or safety problems occur. Improper operation of this

				POTENTIAL IMPACTS		
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
						system could impact human health and safety. Leak detection systems and operating requirements mitigate this potential impact by immediately reducing the amount of fuel available to be released into the environment such that it will impact health and human safety.
5. COMMUNITY & PERSONAL INCOME: Will the facility generate or degrade income?			X			The improvements to this facility will not generate or degrade income.
6. QUANTITY AND DISTRIBUTION OF EMPLOYMENT: Will the project create, move or eliminate jobs? If so, estimate jobs.			X			This project is not estimated to create any new local jobs.
7. LOCAL AND STATE TAX BASE REVENUES: Will the project create or eliminate tax revenue?			X			This project will increase the value of the property and therefore increase property taxes.
8. DEMAND FOR GOVERNMENT SERVICES: Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?			X			Local traffic will not increase substantially. Other services will not be required.
9. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: Will the project add to or alter these activities?			X			No significant impacts are anticipated since the area is currently a school.
10. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?			X			A part of this area is recreational (playground). The recreational portion of this area will not be impacted by this project.
11. AESTHETICS: Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?			X			No impact. Area is a large school building. Noise, light, and odors will be minimal.
12. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: Are there state, county, city, USFS, BLM, tribal, etc., zoning or management plans in effect?			X			The City of Billings and Yellowstone County have a Growth Policy Plan in effect for this area.

				POTENTIAL IMPACTS		
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
13. TRANSPORTATION: Will the project affect local transportation networks and traffic flow?			X		X	This project will not affect local transportation networks and traffic flow unless improper operation leads to emergency spill response.

PUBLIC INVOLVEMENT: The department has attempted to identify interested parties to this application and provide the opportunity for public comment. A copy of this Environmental Assessment of the proposed underground storage tank installation has also been posted at our website (http://www.deq.state.mt.us/ea.asp). Substantive comment may also be provided to email address at ustprogram@state.mt.us

ALTERNATIVES CONSIDERED: No other alternatives were presented or considered.

COMPLIANCE STATUS: This project, as permitted, will be in compliance with the UST regulations. The facility must, however, be operated and maintained in accordance with the UST rules and regulations. This facility is required to have a compliance inspection done within 120 days of the installation of the tank systems.

RECOMMENDATIONS CONCERNING PREPARATION OF AN EIS: Not necessary at this time based upon the information reviewed. The project, as proposed with mandatory operating and permit conditions, will not have a significant environmental impact.

OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Justice, Fire Prevention and Investigation Bureau regulates aboveground components.

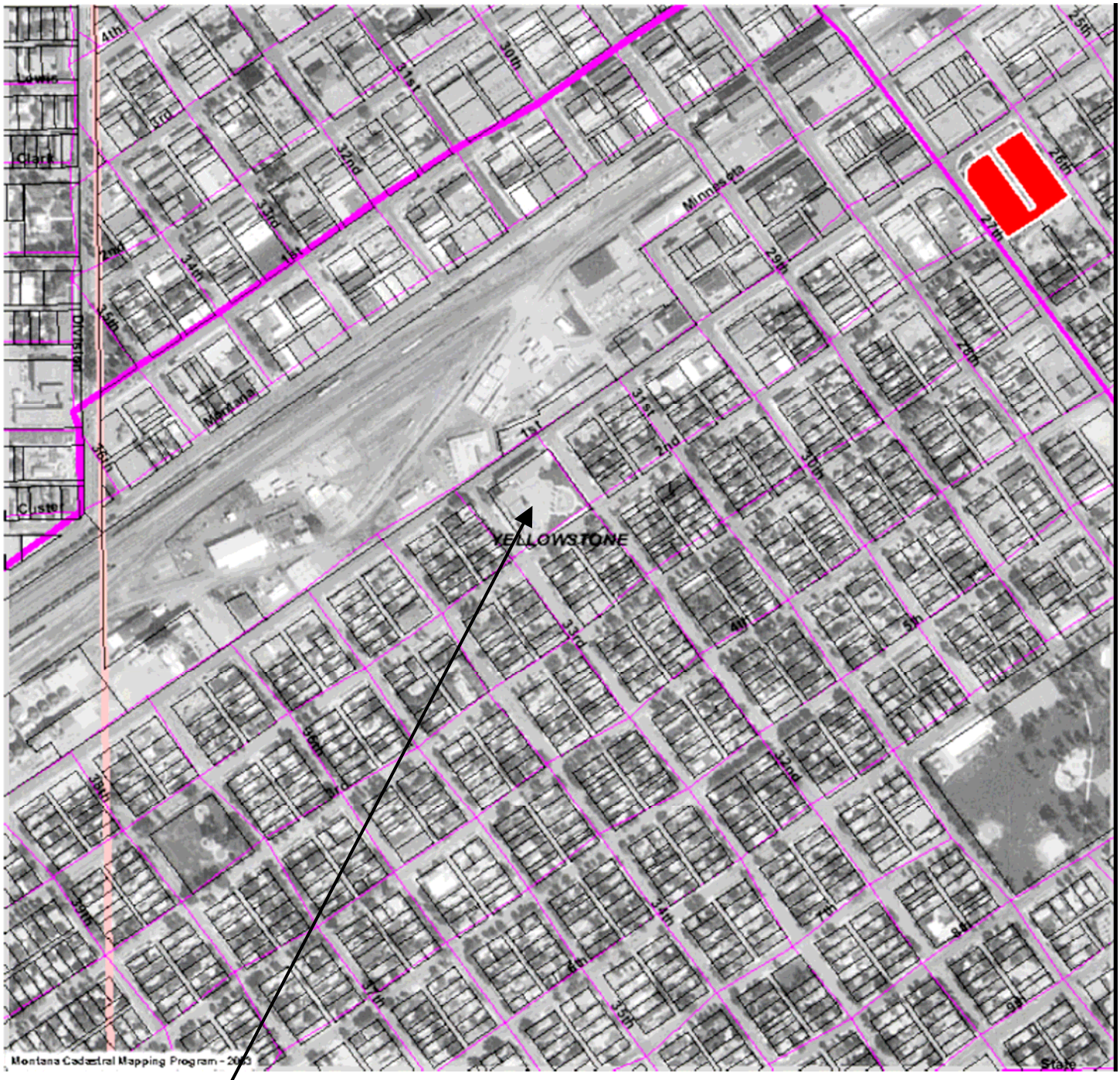
INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA: The owner, the contractor, and the preparer of the EA.

PERMIT CONDITION EFFECTS: Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office
Legislative Environmental Policy Office
Candi Beaudry, Yellowstone County Planning Dept, 510 N. Broadway, Billings, MT 59107

Figures: Aerial Photograph of Site
Contractor's Site Plan

Project Location
Child & Family
Intervention Center



Site Diagram by Contractor